



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

September 24, 1999

Mr. James Colter
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #82
Lester, PA 19113-2090

RE: ARARs Identification at NASJRB Willow Grove

Dear Mr. Colter:

The purpose of this letter is to respond to your correspondence of July 14, 1999, regarding your request that the Environmental Protection Agency (EPA) provide you with the substantive *location-* and *chemical-specific* requirements of Federal environmental laws that we believe are applicable or relevant and appropriate requirements (ARARs) for the Naval Air Station Joint Reserve Base (NASJRB) Willow Grove. In accordance with your request, I am providing you with the following list:

CHEMICAL SPECIFIC

1. Safe Drinking Water Act, 42 U.S.C. § 300f et seq.

a. Maximum Contaminant Level Goals (MCLGs) - 40 C.F.R. § 141.50-51 - Non-enforceable health goals for public water supplies. The NCP requires that non-zero MCLGs shall be attained by remedial actions for ground water that is a current or potential source of drinking water, where the MCLGs are relevant and appropriate under the circumstances of the release.

b. Maximum Contaminant Levels (MCLs), 40 C.F.R. § 141.11-12 - Enforceable standards for public drinking water supply systems (with at least fifteen service connections or used by at least 25 persons). The NCP requires that MCLs for those contaminants whose MCLG is zero, shall be attained by remedial actions for groundwater that is a current or potential source of drinking water, where the MCLs are relevant and appropriate under the circumstances of the release.

2. Clean Water Act; Federal Ambient Water Quality Criteria for the Protection of Aquatic Life 33 U.S.C. § 1314 - These are non-enforceable guidelines established pursuant to Section 304 of the Clean Water Act that set the concentrations of pollutants which are considered

adequate to protect aquatic life. Federal ambient water quality criteria may be relevant and appropriate to CERCLA cleanups based on the uses of a receiving water body.

3. Clean Air Act; National Emissions Standards for Hazardous Air Pollutants, 40 C.F.R. Part 61 - Standards promulgated for air emissions from specific source categories. These may be relevant and appropriate for emissions from air strippers at Superfund sites.

LOCATION SPECIFIC

1. The Endangered Species Act of 1978; 16 U.S.C. §1531; 50 C.F.R. Part 402 - This Act requires federal agencies to ensure that any action authorized by an agency is not likely to jeopardize the continued existence of any endangered or threatened species or adversely affect its critical habitat.

2. The Archaeological and Historical Preservation Act of 1974; 16 U.S.C. §469 - This act requires actions to avoid potential loss or destruction of significant scientific, historical, or archaeological data.

3. Procedures for Implementing the Requirements of the Council on Environmental Quality on the National Environmental Policy Act; 40 C.F.R. Part 6 Appendix A - This is EPA's policy for carrying out the provisions of Executive Order 11990 (Protection of Wetlands). No activity that adversely affects a wetland shall be permitted if a practicable alternative that has less effect is available. If there is no other practicable alternative, impacts must be mitigated.

4. National Historic Preservation Act of 1986; 16 U.S.C. §§470 et seq.; 36 C.F.R. Part 800 - This Act requires remedial action to take into account effects on properties included in or eligible for the National Register of Historic Places and to minimize harm to National Historic Landmarks.

5. Delaware River Basin Commission (DRBC) Ground Water Protected Area Regulations; 18 C.F.R. Part 430 - These regulations establish requirements for the extraction of ground water within the Delaware River Basin. The DRBC approval is necessary for all projects with groundwater extraction of 10,000 gallons per day in a groundwater protected area (GWPA). All of Montgomery County is designated as a GWPA in accordance with DRBC Resolution No. 80-18.

6. Clean Water Act Section 404; 40 CFR Part 230 and 33 FR Parts 320-330 - These regulations require actions to prohibit discharge of dredged or fill material into wetlands without a permit. The substantive portions of these requirements would apply during soil remediation in the event that excavation activities impact wetlands.

LISTING OF "TO BE CONSIDERED" REGULATIONS (TBCs)

Chemical-Specific

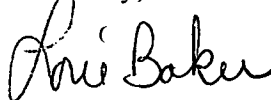
- 1. Integrated Risk Information System (IRIS)** - IRIS is an EPA data base containing up-to-date health risk and EPA regulatory information for numerous chemicals. IRIS contains only those reference doses (RfDs) and cancer slope factors that have been verified by the RfD or Carcinogen Risk Assessment Verification Endeavor Workgroups, and is the preferred source of toxicity information.
- 2. Health Effects Assessment** - These are assessments of chemical-specific health effects that are based on non-enforceable toxicity data.
- 3. EPA Health Advisories on Drinking Water, EPA Office of Drinking Water** - These advisories are non-enforceable guidelines for public water supply systems.
- 4. EPA Region III Risk-Based Concentration Tables** - These tables are non-enforceable guidelines primarily used for chemical screening during baseline risk assessments.

Location Specific

- 1. Ground Water Protection Strategy of 1984; EPA 440/6-84-002** - This strategy identifies ground water quality to be achieved during remedial actions based on aquifer characteristics and use.

In addition to the preceding list, I would recommend that you consult the guidance document entitled, "Compendium of CERCLA ARARs Fact Sheets and Directives", US EPA Office of Emergency and Remedial Response Directive 9347.3-15 for any additional ARARs that may apply, particularly as we proceed to the remediation phase and must identify action-specific ARARS. Should you have any questions regarding the list I've provided to you, please contact me at (215) 814-3355.

Sincerely,



Lorie A. Baker
Remedial Project Manager

cc: Pamela Reigh (PADEP)